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UNITED STATES DISTRICT COURT DISTRICT OF NEVADA

PAMELA S. STEVENS,) Case No. 2:14-cy-01359-APG-VCF
Plaintiff,) Case No. 2.14-cv-01339-AFG-VCF
VS.)
CAROLYN W. COLVIN, Acting Commissioner of Social Security,))
Defendant.))

<u>UNOPPOSED MOTION FOR EXTENSION OF TIME</u> (First Request by Defendant)

COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Jennifer Lee Tarn, Special Assistant United States Attorney, to request that this Court extend the time to respond to Plaintiff's Motion to Remand, which was filed on March 10, 2015, by thirty days. This is Defendant's first request for an extension of time. Counsel for Defendant contacted Plaintiff's counsel on March 31, 2015, and Plaintiff does not oppose Defendant's motion. Defendant's current deadline is April 6, 2015.

The instant request is not intended to cause delay and is necessary because this matter was recently transferred to a new attorney who is conferring with the client regarding settlement. It is

therefore respectfully requested that Defendant be granted a thirty (30) day extension of time to respond to Plaintiff's motion, up to and including May 6, 2015.

Dated: April 1, 2015.

Respectfully submitted

DANIEL G. BOGDEN United States Attorney

/s/ Jennifer Lee Tarn

JENNIFER LEE TARN Special Assistant United States Attorney

OF COUNSEL:

DONNA L. CALVERT Regional Chief Counsel

IT IS SO ORDERED

UNITED STATES MAGISTRATE JUDGE CAM FERENBACH

April 2, 2015

DATED:

CERTIFICATE OF SERVICE

I, Jennifer Lee Tarn, certify that the following individual(s) were served with a copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method of service, identified below:

CM/ECF:

Marc V. Kalagian 211 E. Ocean Blvd., Suite 420 Long Beach, CA 90802 Email: marc.kalagian@rksslaw.com

Gerald M. Welt, Chtd. 703 S. 8th St. Las Vegas, NV 89101

Email: gmwesq@weltlaw.com

Dated this 1st day of April, 2015

/s/ Jennifer Lee Tarn JENNIFER LEE TARN